

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO
as representative of
THE COMMONWEALTH OF PUERTO RICO
Debtor¹

PROMESA - TITLE III

Case No. 17-3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION AND NOTICE OF REQUEST TO BE HEARD
AT JULY 13-14, 2021 OMNIBUS HEARING**

PLEASE TAKE NOTICE that, pursuant to this Court's Order Regarding Procedures For July 13-14, 2021 Omnibus Hearing, Dkt. No. 17210 the following active or former government employees as group creditors holding back pay awards pursuant of final judgements entered by Commonwealth courts, in the following cases: Juan Pérez-Colón et al (324 Plaintiffs} collectively (the "Perez-Colon Plaintiffs Group); Jeannette Abrams-Diaz et al (1084 Plaintiffs) collectively (the Abrams- Diaz plaintiffs Group); Nilda Agosto-Maldonado, Plaintiffs Group; collectively (729 plaintiff's); Cruz-Hernandez, Carmen Socorro Plaintiff Group (334 plaintiffs) TPI K AC1991-0665; and Group of creditors of the Consolidated CFI Judgments dated April 22, 2016 (Norberto

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Tomassini et al & Ivan Ayala; Plaintiff, A MI 2003-0243 y A PE 2005-0049) (87 Plaintiffs). **Also** joins the following group wage creditors, included in the pending cases before the Commonwealth Appeal Board (CASP): Abraham-Gimenez, et al (1,046 Plaintiffs) collectively (the Abraham Gimenez Plaintiffs Group; CASP no 2021-01-0346; Alejo Cruz – Santos, et al (262 Plaintiffs') collectively (the Cruz Santos Plaintiff Group) CASP 2002-06-1493.; Delfina Lopez-Rosario, et al Collectively The Lopez-Rosario Plaintiffs Group); (1,345 plaintiffs) CASP 01-10-372; Beltran-Cintron, Plaintiff Group collectively (the Beltran-Cintron Plaintiff Group (4,593 Plaintiffs); CASP no. 2021-01-0345 and Madeline Acevedo-Camacho et al (2,518 Plaintiffs) CASP no 2016-05-1340, and Prudencio Acevedo-Arocho, et al (1,601 Plaintiffs)TPI KAC 2005-5022, through the undersigned attorney and respectfully states as follows:

1. Mrs. Ivonne Gonzalez-Morales will speak on behalf of above identified group claimants at the July 13 - 14, 2021, Omnibus Hearing, which will be conducted telephonically via Court Solutions due to the ongoing public health crisis.
2. Mrs. Ivonne Gonzalez-Morales will speak regarding Group Claimants relevant Motion objecting the Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico (ECF No. 17191) (the "Amended Plan" and Disclosure Statement filed on June 29, 2021 (Docket no. 17192) and requesting for entry for an order pursuant to Federal Rule of Bankruptcy Procedure 3013 to reclassify together employee wage claims included in class 55, with class 49, AFSCME employees claims or in the alternative, be placed in a separate class to provide group wage claims holders equal treatment as provided to AFSCME employees grievance and collective bargaining pre-petition wage awards and requesting related reliefs (Docket 17021).

3. Mrs. Ivonne Gonzalez-Morales, also reserve the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Omnibus Hearing, or raised by any party at the Omnibus Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the appearing claimants.

4. Mrs. Ivonne Gonzalez-Morales further reserve the right to amend this informative Motion as needed.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 7 th day of July, 2021.

IT IS HEREBY CERTIFIED, that on this same date we have electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all counsels of record.

By /s/ Ivonne González Morales
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